

Matthew R. Friedman
202 429 6459
mfriedman@steptoe.com



1330 Connecticut Avenue, NW
Washington, DC 20036-1795
202 429 3000 main
www.steptoe.com

February 19, 2019

By ECFS

Michelle M. Carey
Chief, Media Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

**Re: Declarations of Confidentiality, beIN Sports, LLC, Complainant,
 v. Comcast Cable Communications, LLC and Comcast Corporation, Defendants,
 MB Docket No. 18-384, File No. CSR-8972-P**

Dear Ms. Carey:

On behalf of beIN Sports, LLC ("beIN"), enclosed are executed copies of the Declarations of Confidentiality required by the Media Bureau's Protective Order (DA 19-65) for access to Highly Confidential Information filed in the above-referenced docket. The executors of the enclosed Declarations are outside consultants for beIN who are seeking access to Highly Confidential Information for the purpose of assisting outside counsel of record in this proceeding.

Sincerely,

/s/ _____
Matthew R. Friedman
Counsel to beIN Sports, LLC

Enclosures

CERTIFICATE OF SERVICE

I, Matthew R. Friedman, hereby certify that on February 19, 2019, I caused true and correct copies of the foregoing to be served by electronic mail upon the following:

Michael D. Hurwitz
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20006

Sincerely,

/s/
Matthew R. Friedman
Stephoe & Johnson LLP

ATTACHMENT A

DECLARATION

I, _____, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Commission in this proceeding, and I understand it. I agree to be bound by its terms pertaining to the treatment of Highly Confidential Information submitted by parties to this proceeding and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Protective Order.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any Highly Confidential Information obtained as a result of the Protective Order is due solely to my capacity as (1) Outside Counsel of Record or (2) other person described in paragraph 4 of the foregoing Protective Order, and that I will not use such Highly Confidential Information in any other capacity; nor will I disclose such Highly Confidential Information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Highly Confidential Documents and Highly Confidential Information are used only as provided in the Protective Order; and (2) Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Stamped Highly Confidential Documents or Highly Confidential Information.

I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement between the undersigned and the Submitting Party.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

(signed) Kevin Caves

(printed name) _____

(title) _____

(employer) _____

ATTACHMENT A

DECLARATION

I, Augustus Urschel, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Commission in this proceeding, and I understand it. I agree to be bound by its terms pertaining to the treatment of Highly Confidential Information submitted by parties to this proceeding and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Protective Order.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or public interest organization), I acknowledge specifically that my access to any Highly Confidential Information obtained as a result of the Protective Order is due solely to my capacity as (1) Outside Counsel of Record or (2) other person described in paragraph 4 of the foregoing Protective Order, and that I will not use such Highly Confidential Information in any other capacity; nor will I disclose such Highly Confidential Information except as specifically provided in the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Highly Confidential Documents and Highly Confidential Information are used only as provided in the Protective Order; and (2) Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order, and I certify that I have verified that there are in place procedures, at my firm or office, to prevent unauthorized disclosure of Stamped Highly Confidential Documents or Highly Confidential Information.

I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission. I acknowledge that this Protective Order is also a binding agreement between the undersigned and the Submitting Party.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

(signed)	<u>Augustus Urschel</u>
(printed name)	<u>Augustus Urschel</u>
(title)	<u>Economist</u>
(employer)	<u>Econ One</u>